



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JAN 10 2003

REPLY TO THE ATTENTION OF:

B-19J

E.B. Fitzpatrick III, District Ranger  
Eagle River-Florence Ranger District  
Chequamegon-Nicolet National Forest  
HC 1 Box 83  
Florence, WI 54121  
Attn: Shirley Frank, Project Manager

**Subject: U.S. EPA Comments on the Draft Environmental Impact Statement for the  
Northwest Howell Project on the Chequamegon-Nicolet National Forest, WI  
EIS# 020478**

Dear Mr. Fitzpatrick:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statements (EISs) for the **Northwest Howell Project on the Chequamegon-Nicolet National Forest, Wisconsin**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act (CAA).

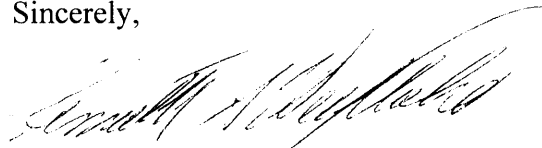
The DEIS includes a no action alternative, and three action alternatives. The USFS presents the Proposed Action, Alternative 2, as best addressing the purpose and need in the project area. Needs include diversifying tree species, and age groups within forest stands, changing species dominance patterns in some river corridors, providing timber products for commercial use, and changing the transportation system within the forest boundaries. The project is consistent with the existing Management Plan prepared for the Nicolet National Forest.

U.S. EPA has rated the document **LO - Lack of Objections**. This rating indicates that our review did not identify any potential environmental impacts requiring substantive changes to the proposed action. Based on our review, we compliment the USFS on incorporating

and forest ecosystems. U.S. EPA also supports the USFS efforts at restoration of forest structure along the rivers in the project area, and we encourage the USFS to work cooperatively with other agencies to initiate and complete comprehensive river restoration efforts as opportunities become available. Last, we recommend that the text under "Unavoidable Adverse Effects" be modified so that it addresses specific adverse effects that cannot be mitigated under the action alternatives. A summary of U.S. EPA's rating system is attached.

Please send only two copies of the final EIS to this office at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please call Rosalyn Johnson of my staff at (312) 353-5692 or send email to [johnson.rosalyn@epa.gov](mailto:johnson.rosalyn@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth A. Westlake", written in dark ink.

Kenneth A. Westlake  
Chief, Environmental Planning and Evaluation Branch  
Office of Strategic Environmental Analysis

Attachment (1):      Ratings Summary

## **SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\***

### **Environmental Impact of the Action**

#### LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

#### EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS state, this proposal will be recommended for referral to the CEQ.

### **Adequacy of the Impact Statement**

#### Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made

